

1 MELINDA HAAG (CABN 132612)  
United States Attorney

2 J. DOUGLAS WILSON (DCBN 412811)  
3 Chief, Criminal Division

4 S. WAQAR HASIB (CABN 234818)  
Assistant United States Attorney  
5 450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
6 Telephone: (415) 436-7200  
Fax: (415) 436-7234  
7 E-Mail: waqar.hasib@usdoj.gov

8 Attorneys for the United States of America

9  
10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,	) NO. CR 13-00454 EMC
	)
14 Plaintiff,	) [PROPOSED] ORDER EXCLUDING TIME FROM
	) JULY 24, 2013 THROUGH AUGUST 20, 2013
15 v.	)
	)
16 ALAIN OMAR CABRERA,	)
a/k/a Alain Cabrera-Madrigal,	)
17 a/k/a Juan Cabrera-Madrigal,	)
a/k/a Juan Lopez-Cortez, and	)
18 LIZBETH LOPEZ,	)
a/k/a Lizbeth Lopez-Cortez,	)
19 a/k/a Lizbeth Cabrera-Madrigal,	)
	)
20 Defendants.	)

21  
22 The defendants, Alain Omar CABRERA-MADRIGAL, represented by Brandon M. LeBlanc,  
23 Assistant Federal Public Defender, and Lizbeth LOPEZ, represented by George C. Harris, Esq., and the  
24 United States, represented by S. Waqar Hasib, Assistant United States Attorney, appeared before the  
25 Court on July 24, 2013 for a status hearing. The parties represented that the United States had produced  
26 initial discovery, and that additional discovery was in the process of being produced. The parties jointly  
27 requested a continuance of the matter so that said discovery matters could be resolved.

28 The matter was continued to August 20, 2013 at 2:30 p.m. for a status conference and trial

1 setting hearing. Counsel for the defendants requested that time be excluded under the Speedy Trial Act  
2 from July 24, 2013 through August 20, 2013 because they needed time to review discovery, and to  
3 conduct further necessary investigation. The United States stated it had no objection to excluding time.

4 Based upon the representation of counsel and for good cause shown, the Court finds that failing  
5 to exclude the time from July 24, 2013 through August 20, 2013 would unreasonably deny the  
6 defendants continuity of counsel and would deny counsel the reasonable time necessary for effective  
7 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The  
8 Court further finds that the ends of justice served by excluding the time from July 24, 2013 through  
9 August 20, 2013 from computation under the Speedy Trial Act outweigh the best interests of the public  
10 and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time from July 24,  
11 2013 through August 20, 2013 shall be excluded from computation under the Speedy Trial Act. 18  
12 U.S.C. § 3161(h)(7)(A) and (B)(iv).

13  
14 7/26/13  
15 DATED: \_\_\_\_\_  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

